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Belleville, Ontario.

November 12, 1937.

To:

Dalton Wells, Esq.,
Secretary,
Royal Commission on Transportation, Ontario,
302 Bay St.,
Toronto, Ontario.

Sirs:

The National Cannery Association of Canada, on behalf of the Ontario Members of this Association, desire at this time to make submissions dealing with your investigation into motor truck operation in the Province of Ontario, in accordance with your investigation being conducted by Order-in-Council made 13th of October, 1937.

The canners of Ontario are large users of transportation by highway, rail and water, and as they are engaged in the canning of fruits and vegetables, products of the farms, it is necessary that this industry be largely located in the rural sections of the Province, and depend very largely in the operations of the canning plants on the motor trucks as a method of transportation.

The highways of Ontario have contributed very largely in the development of the canning industry in the Province of Ontario, by enabling the canning plants to reach out and contract for produce over a much larger area, and a greater distance from the plants than was possible years ago, owing to the problem of getting such crops to the factories, which has been solved by the growers, canners and public commercial vehicles being placed in a position to get the growers' produce to the plants with minimum delay and expense.

Highway transportation, also, has contributed very largely to the flexibility of marketing these products of the canning plants, not only within the Province of Ontario, but throughout the Dominion and particularly in connection with export trade, as trucking to the water carriers has enabled the Ontario canners to reach various parts of the country at much more favorable rates, in order to meet competition from British Columbia in Western Canada, and from Quebec packers in the East.

The export trade in canned fruits and vegetables is a very important factor in that it has made an outlet for a considerable amount of Ontario-grown produce, and by using the trucks from the various canning plants to water, it has enabled the canners of Ontario to have the same direct water competition, principally to the United Kingdom markets, as at present enjoyed by the large canning industries in the United States, located along or adjacent to the Atlantic Seaboard, with the direct result that today, the canner of Ontario enjoys as favorable an ocean and water rate to the United Kingdom as that applicable from the Atlantic Seaboard. Without this truck method of transportation, it would have been impossible, for there are only a limited number of factories located at water points, making it absolutely necessary that the inland factory points truck to the nearest port in order to effect this method of marketing these export goods. This method of transportation was not possible before the advent of the truck, as the rail carriers would not make joint rates via various lake ports for water transportation, particularly for export, but only established such special rates by the regular ocean ports, such as - Montreal, Quebec, Halifax, Saint John, or American North Atlantic ports.

The saving effected by truck method of transportation from the canning plants to the various markets in Ontario, amounts to considerable, and we submit for your consideration that, in view of the fact that there is so much competition existing between the trade handling these varieties of foodstuffs, that the public directly obtain the benefit of these savings, and if it was necessary to pay transportation on the basis of the established rates in effect by rail carriers, the public generally, would undoubtedly find a material increase in the cost of these goods.

It is to Section 4 of the Order-in-Council that we desire to make certain submissions:

Under the regulations respecting the licensing of public

commercial vehicles, approved by Order-in-Council on the 22nd day of February, 1936, a Class "C" private carrier is defined as follows:-

"Any Public Commercial Vehicle operated for Transportation of goods belonging to one person, only, on a trip, from or to the home terminal of the operator, or such other place or places as may be named in the license of the operator."

We submit, for your consideration, that, considering the fact that this Class "C" operator pays the same license fee and tax on his motor vehicles as any other Class, the operator should not be restricted only to and from his home terminal, for the reason that, canning plants being largely located in the smaller towns and villages, it is unfair in the first place, to an operator located in these smaller communities to be restricted, and only be permitted to haul goods to and from such a point, while the operator in the larger city has the choice and is able to cater to a much greater number of shippers. Furthermore, the canning plants in these smaller villages or towns should be able to contract in any nearby town, to get a class "C" operator to haul his goods, to or from such plant as there are many towns and villages only having one or two class "C" operators, and when these operators are busy, it is impossible to get the necessary service.

It has made it necessary, in some instances, for canning plants to have their own equipment, and we feel, in view of the above that such Class "C" operators should be enabled to pick up any one shippers' goods, regardless of where goods are located, to or from any points in Ontario.

Motor vehicles at the present time, are an essential part of the operating of canning factories, and in many instances these canning plants are located some distance away from rail lines or ports and such vehicles are the only means of enabling the shipping out of such plants and the fact that these plants are located in these smaller communities makes it necessary for them to secure their supplies and find their markets outside of these communities. In this respect we are somewhat differently situated than the manufacturer or trader who is usually able to buy considerable quantities of supplies within the city in which



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he is located, and also enabled to market some of the manufactured articles within his own community. However, in the packing of perishable products in canning plants, when supplies, machinery parts for breakdowns, etc., are necessary, it is usually necessary to use the trucks on the highways, and in this respect, we feel that manufacturers in these small towns or villages have, by far, more use for these trucks on the highways than those located in the larger cities, as their business naturally is confined within the rural sections of the country.

The canners operating their own motor vehicles on the highways are, in addition to the taxation which they already contribute on motor trucks, - large contributors of taxes in business and property, to a much greater extent than those transportation companies engaged exclusively in the business of transportation by truck by highway.

We, therefore, submit that your Commission should not place any restrictions or handicap in the way of regulations or increased taxation, only to that extent which is found necessary and reasonable for transportation by highway by private or public commercial vehicles, - which will, in any way, restrict or retard this flexible method of transportation.

All of which is respectfully submitted.

National Canners Association of Canada.

